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January 27, 2017

CERTIFIED MAIL
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Mr. Larry Kisor
Plant Manager
Mueller Company
1401 Mueller Avenue
Chattanooga, TN 37406

Re: **Compliance Evaluation Inspection (CEI)**
Mueller Company
TMSP Tracking Number: TNR051467
1401 Mueller Avenue
Hamilton County, Tennessee

Dear Mr. Kisor:

In response to a complaint received by the US EPA Region 4, Michael Bascom of the Division of Water Resources (DWR) performed a Compliance Evaluation Inspection (CEI) for the above referenced facility on December 9 and 13, 2016. He met with Jessica George, James Hoff and Jason Coots who provided information during the inspection. The purpose of the inspection was to evaluate Mueller Company's (Mueller) compliance with the terms and conditions of the Tennessee Multi-sector Permit (TMSP), NPDES Permit Tracking Number TNR051467.

Permit Verification

Mueller Company has coverage under the Tennessee Multi-sector Permit, Sectors F, AA, P and L which became effective on May 8, 2015 and expires on April 14, 2020. The permit authorizes Mueller Company to discharge its storm water runoff to South Chickamauga Creek. Copies of the Notice of Intent (NOI) and Notice of Coverage (NOC) were available onsite.

Records and Reports

During the inspection, Mr. Bascom reviewed a copy of the Mueller Company's Storm Water Pollution Prevention Plan (SWPPP). The SWPPP contained a signed certification statement. However, the SWPPP did not contain a signed non-stormwater certification statement and the pollution prevention team roster was out of date. Records of stormwater training were not available for 2014, 2015 or 2016.

Facility Site Review

Mueller Company is a gray iron foundry and a manufacturer of gate valves, SIC code 3321, 3498 on 46 acres within Hamilton County, TN. The facility employs 402 persons and operates 2 shifts day, 5 days each week. Facility consists of several large buildings containing foundry, assembly and warehouses. Discharge from the site consists of all storm water runoff from with facility perimeter.

Mr. Bascom observed that the corridors between buildings contained varying amounts of foundry sand. He also observed a large stockpile of foundry sand stored in a large building. Personnel stated that sand is accumulated here before it is taken to the landfill. Behind this building, Mr. Bascom observed a rail spur where fresh sand is unloaded. In the corridor that led to the building, Mr. Bascom observed a large amount of fresh sand on the ground. He also observed several bag houses. Personnel stated that all storm drains within these corridors as well as the ones within facility perimeter direct stormwater to the retention pond.

A corridor between two buildings begins at the south door of the foundry sand storage building. Mr. Bascom observed a large blue roll-off bin covered by a heavy tarpaulin staged in this corridor (Figures 1, 2 and 3). Personnel stated that the "blue box" (roll-off bin) contains quench/make-up water. Occasionally this bin may overflow and go into the storm drain located here. Mr. Bascom commented that the "blue box" has been the source of several complaints in recent years. As stated above, all facility storm drains are routed to the retention pond and overflow is not an issue.

According to personnel all storm drains are routed to the retention pond (Figure 4). The retention pond contained a large amount of water from recent rains. Discharge from the retention pond is controlled by a culvert. At the time of inspection, the outfall was not discharging. Mr. Bascom observed that saplings had taken root and were beginning to become trees on the interior slopes of the retention pond. He also observed saplings on the exterior slope (north) of the retention pond. The root systems of these trees will eventually undermine the berm; it is recommended that they be removed.

The facility has a landfill for disposal of waste foundry sand. The landfill is surrounded by a ditch and berm. At the northeast corner of the landfill Mr. Bascom observed that the berm had been disturbed. According to personnel, a road had been installed to allow a crane to access the Riverwalk. It appeared that the berm had been lowered as part of the road construction. Mr. Bascom discussed with them the need to improve the berm.

Effluent/Receiving Stream

Outfall 01 was dry at the time of inspection. It did not appear that the retention pond discharges.

Self-Monitoring Program

Your permit requires that you maintain records of monthly inspections of outdoor areas, quarterly visual inspections, and Annual Comprehensive Site Evaluations for three (3) years. During the inspection, Mr. Bascom found that documentation of monthly inspections of outdoor areas had started in May 2016; there were no records of quarterly visual inspections of the outfall; one Annual Comprehensive Site Evaluations conducted in 2014. Personnel stated that the reason for this was that the former Environmental manager had taken or disposed of all documentation when he left the company.

Operation and Maintenance

The facility conducts regular inspections to identify areas that require maintenance. However, personnel had failed to note that saplings were becoming well established on the slopes of the retention pond. Personnel stated that the retention pond is dredged but could not specify the frequency. Personnel also stated that corridors are routinely swept. It was evident that some sweeping must occur frequently otherwise the corridors would become impassable.

Pollution Prevention

A significant amount of foundry sand was observed throughout the facility. Personnel stated that the facility sweeps areas where sand accumulates periodically. Pallets are stored in a central location. Scrap wood from pallets was observed throughout the facility and on top of storm drains. As all stormwater is routed to a retention pond this is not a significant problem but personnel should be aware that this could cause clogs and lead to flooding during a rain event. Routing all stormwater to the retention pond is a good BMP and the long residence time ensures that the foundry sand has sufficient time to settle out of the water column. However, the use of a perforated stand pipe or "trickle tube" is not recommended for use at sediment ponds because they are not an effective means of sediment reduction. It is recommended that Mueller replace the "trickle tube" with a standpipe and skimmer assembly. An example of which is contained in the Tennessee Erosion and Sediment Control Handbook.

Violations:

- By failing to implement your SWPPP, the facility is not in compliance with its permit.
- By failing to conduct quarterly visual inspections of outfalls and annual comprehensive site evaluation in 2015 and 2016, the facility is not in compliance with its permit.
- Facility's SWPPP did not contain signed non-stormwater certification statement.

- Documentation of Annual stormwater training was not available for years 2014, 2015 and 2016.

Required Actions:

- Prior to February 1, 2017, the facility must implement its SWPPP by conducting: monthly inspections for outdoor areas, quarterly visual inspections of outfalls, annual comprehensive site evaluations, and stormwater training.

Additional Comment:

- Mr. Hoff conducted stormwater training on January 9, 2017 and provided a non-stormwater certification statement on January 23, 2017. DWR thanks you for your prompt attention to these items.

This letter provides a record of the December 9, 2016 Compliance Evaluation Inspection.

The Division would like to thank James Hoff, Jessica George and Jason Coots for their time and assistance during our inspection. If you have any questions concerning either our inspection or this report, please contact Mr. Bascom at (423) 634-5710.

Sincerely,

Jennifer Innes
Program Manager
Division of Water Resources

cc: Mounir Minkara, Ph.D., Water Quality Manager, City of Chattanooga via email

Photographic Log

Facility Name:	Site Location:	NPDES Tracking No.:
Mueller Company	Interior corridor	TNR051467

Photo No.	Date
1	December 9, 2016

Description
"Blue box" Blue roll-off bin containing quench water staged in interior corridor.

Photo No.	Date
2	December 9, 2016

Description
"Blue box" Blue roll-off bin containing quench water staged in interior corridor.